

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF TEXAS

Fort Worth Division

In re: ERNESTO ALAMOS

Case No: 21-41026-MXM-13

Chapter: 13

Property Address: 14024 WRANGLER WAY, HASLET, TX 76052

Last four digits of any number you use to Identify the Debtor's account: 9152

Court Claim No. (if known): 12

STATEMENT IN RESPONSE TO NOTICE OF AMOUNT DEEMED NECESSARY TO CURE MORTGAGE ARREARS UNDER L.B.R. 3002-2

COLONIAL SAVINGS, F.A.

("Creditor") hereby responds to that certain Notice of Amount Deemed Necessary to Cure Mortgage Arrears ("Cure Notice") dated October 29, 2024 and filed as Docket 42 that as of the date of this response Creditor:

Pre-Petition Amounts

Received

Applicable option is checked

☒ Agrees that the Trustee has paid the amounts listed on the Cure Notice towards the Creditor's claim.

☐ Disagrees that the Trustee has paid the amounts listed on the Cure Notice towards Creditor's claim. Creditor states that the total amount received as of the date of this response is:

Total Amount Due:

Attached is an itemized Statement of amounts paid through the date listed on the Statement.

Post-Petition Amounts

Outstanding

Applicable option is checked

☒ Agrees that Debtors are current with respect to all post-petition payments, fees and costs, whether paid directly to Creditor or being paid through Debtor's Chapter 13 Plan as of the date of this response.

☐ Disagrees that Debtors are current with respect to all post-petition payments, fees and costs as of the date of the Cure Notice and states that the total amount to cure the post-petition arrearage as of the date of this response is:

Total Amount Due:

Attached is an itemized Statement of the post-petition arrearage due and owing through the date listed on the Statement. The outstanding amounts identified on the Statement do not reflect amounts that became or may become due after the date listed therein, including any fees that may have been incurred in the preparation, filing or prosecution of this Cure Notice.

The outstanding amounts identified on the attached Statements may not, due to timing, reflect all payments sent to Creditor as of the date stated therein. In addition, the amounts due may include payments reflected on the Notice of Amount Deemed Necessary to Cure Mortgage Arrears but which have not yet been received and/or processed by Creditor.

UNITED STATES BANKRUPTCY COURT

X /s/ JOHN R. CALLISON
Signature

X 11/18/2024
Date (MM/DD/YYYY)

First Name: **JOHN R.** Middle Name: Last Name: **CALLISON**

Title: **Attorney for Creditor**

Company **BARRETT DAFFIN FRAPPIER TURNER & ENGEL, LLP**

Address **4004 BELT LINE RD. SUITE 100**

City **ADDISON** State: **TX** Zip: **75001**

Phone **(972) 386-5040**

UNITED STATES BANKRUPTCY COURT

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2024, a true and correct copy of the Statement in Response to Notice of Amount Deemed Necessary to Cure Mortgage Arrears Under L.B.R. 3002-2 was served via electronic means as listed on the Court's ECF noticing system or by regular first class mail to the parties listed on the attached list.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP

BY: /s/ JOHN R. CALLISON

11/18/2024

JOHN R. CALLISON
TX NO. 24076295
4004 BELT LINE RD. SUITE 100
ADDISON, TX 75001
Telephone: (972) 386-5040
Facsimile: (972) 661-7725
E-mail: NDECF@BDFGROUP.COM
ATTORNEY FOR CREDITOR

UNITED STATES BANKRUPTCY COURT

BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL:

DEBTOR:

ERNESTO ALAMOS
14024 WRANGLER WAY
HASLET, TX 76052

DEBTOR'S ATTORNEY:

CLAYTON EVERETT
515 EAST BORDER ST., STE 163
ARLINGTON, TX 76010

TRUSTEE:

TIM TRUMAN
6851 N.E. LOOP 820, SUITE 300
N RICHLAND HILLS, TX 76180

UNITED STATES TRUSTEE:

1100 COMMERCE STREET
ROOM 976
DALLAS, TX 75242